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VIA ECF

The Honorable Joanna Seybert United States District Judge U.S.D.C., Eastern District of New York 100 Federal Plaza, Courtroom 1030 Central Islip, NY 11722

Re: In re Hain Celestial Heavy Metals Baby Food Litigation, Case No. 2:21-cv-678-JS-AYS Request for Consolidation of Related Cases

Dear Judge Seybert:

I represent Defendant The Hain Celestial Group, Inc. in the above-referenced action. I write to notify the Court of the following cases pending in this District, which assert "consumer protection type claims" against Hain Celestial and not against any other defendant:

- 1. Gray v. Hain Celestial Group, Inc., Case No. 2:21-cv-1569-JS-SIL; and
- 2. Anderson v. Hain Celestial Group, Inc., Case No. 2:21-cv-1621-JMA-ARL.

A copy of the complaint in *Gray* is attached as Exhibit A, and a copy of the complaint in *Anderson* is attached as Exhibit B.

Pursuant to the Court's order consolidating all similar consumer fraud actions against Hain Celestial into a single Consolidated Action (ECF No. 47), Hain Celestial respectfully requests that these two actions—which post-date the filing of the *Stewart* plaintiffs' motion for consolidation—be consolidated into the Consolidated Action.

Respectfully submitted,

/s/ Dean N. Panos
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